

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION**

RACHEL LYNN WILLIAMSON)
and CONSTANCE NOCOA,)
individually and on behalf of all others)
similarly situated)
Plaintiffs,)

vs.)

CASE NO.: 1:24-CV-01526-TWP-MJD

GERARDO LORENZO LINARDUCCI,)
an Indiana individual, and)
INTEGRITY WEALTH PARTNERS,)
LLC, an Indiana limited liability)
Corporation, and DUCCI)
ENTERPRISES, LLC, an Indiana)
limited liability corporation,)
Defendants.)

DECLARATION OF GERARDO LORENZO LINARDUCCI

I, Gerardo Lorenzo Linarducci, on behalf of Integrity Wealth Partners, LLC and Ducci Enterprises, LLC, declares as follows:

1. I am a resident of the United States, an adult over the age of eighteen, and am competent to testify and have personal knowledge of the facts stated in this declaration.

2. I am and have always been the sole member and owner of Integrity Wealth Partners LLC and Ducci Enterprise LLC.

3. Integrity Wealth Partners LLC was formed on July 17, 2024. A true and correct copy of Integrity Wealth Partners, LLC's articles of organization are attached to this declaration as Exhibit A.

4. I understand that Plaintiffs in the above-captioned case have alleged that "at least 100 or more clients of the Defendants who were solicited to invest in the REAL program at Drive Planning." (Dkt. 37 at 16, ¶ 65).

5. On June 27, 2025, I filed for Chapter 13 bankruptcy in the United States Bankruptcy Court for the Southern District of Indiana, Cause No. 25-03768-JMC-13 ("Chapter 13 Bankruptcy"). *See In re Gerardo Lorenzo Linarducci*, No. 25-03768-JMC-13, ECF No. 1 (June 27, 2025).

6. In the Chapter 13 Bankruptcy, I filed a Schedule E/F, a true and correct copy of which is attached to this declaration as Exhibit B. See also *In re Gerardo Lorenzo Linarducci*, No. 25-03768-JMC-13, ECF No. 21 (June 27, 2025).

7. In Exhibit B, I identified individuals who may or have alleged potential claims against me relating to the REAL program at Drive Planning as "Nonpriority unsecured" claimants whose claims are contingent, unliquidated, disputed, and "alleged non-consumer debt." Exhibit B at 24–54.

8. These claimants are identified in Exhibit B under the following entries on pages 24–54; they are current and/or former clients of mine and are no more than 65 in number. 52 of these 65 persons (that is 80%) are Indiana residents. They, and the state in which they reside, are identified as follows:

	Claimant #	State of Residence
1.	4.1	Indiana

2.	4.5	Indiana
3.	4.6	Indiana
4.	4.7	Indiana
5.	4.8	Indiana
6.	4.9	Indiana
7.	4.13	Indiana
8.	4.14	Indiana
9.	4.15	Indiana
10.	4.17	Indiana
11.	4.19	Georgia
12.	4.20	Indiana
13.	4.21	Indiana
14.	4.22	Indiana
15.	4.23	Indiana
16.	4.24	Indiana
17.	4.25	Indiana
18.	4.26	Indiana
19.	4.27	Georgia
20.	4.28	Georgia
21.	4.29	Indiana
22.	4.32	Indiana
23.	4.33	Indiana
24.	4.34	Indiana
25.	4.35	Indiana
26.	4.36	Georgia
27.	4.37	Indiana
28.	4.38	Indiana
29.	4.39	Indiana
30.	4.40	Indiana
31.	4.41	Indiana
32.	4.42	New Jersey
33.	4.43	Indiana
34.	4.47	Georgia
35.	4.48	Indiana
36.	4.49	Indiana
37.	4.50	Florida
38.	4.51	Indiana
39.	4.52	Indiana
40.	4.53	Indiana
41.	4.54	Indiana
42.	4.55	New Jersey
43.	4.56	Florida
44.	4.57	Indiana

45.	4.58	Indiana
46.	4.59	Indiana
47.	4.60	Indiana
48.	4.61	Indiana
49.	4.62	Indiana
50.	4.63	Indiana
51.	4.64	Indiana
52.	4.65	Indiana
53.	4.66	Indiana
54.	4.67	Indiana
55.	4.68	New York
56.	4.69	Pennsylvania
57.	4.70	Indiana
58.	4.72	Indiana
59.	4.73	Indiana
60.	4.80	Indiana
61.	4.82	Georgia
62.	4.85	Georgia
63.	4.87	Indiana
64.	4.88	Indiana
65.	4.89	Indiana

Exhibit B at 24–54.

9. To the best of my knowledge and belief, neither I, nor Integrity Wealth Partners, LLC nor Ducci Enterprises, LLC, had contact with any other persons during the time-period alleged in the Second Amended Complaint who may have invested in the REAL program at Drive Planning.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 2, 2025.



Gerardo Lorenzo Linarducci (Oct 2, 2025 12:58:40 EDT)

Gerardo Lorenzo Linarducci